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USA

Mr. Deepak Joshi  
Lead Aerospace Engineer (Structures)  
National Transportation Safety Board  
490 L'Enfant Plaza, SW  
Washington, DC 20594

Feb. 15, 2005

Dear Mr. Joshi,

I would like to comment on the limited value of the NTSB Notice of Proposed Rulemaking (NPRM 427) posted in the Federal Regulation pages 77150 to 77152 on December 27, 2004, that proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

The proposed change in 830.2 to eliminate ground rotor strikes from the exemption portion of the definition of "substantial damage" is not appropriate, and is strongly opposed. These incidents are being reported to the NTSB now and no field investigations are occurring. The NTSB is extremely understaffed and only goes to the accident site on 17.7% of all U.S. Registered helicopter accidents under the present definition thus it is extremely unlikely the NTSB will actually do a field investigation of these new ground rotor blade strike accidents. This proposed regulatory change would increase the number of recorded accidents and increase costs to the operators with no significant safety gain.

I recommend that there be NO change to the 14 CFR 830.2 definition of "substantial damage".

If the NTSB feels it must have more regulatory reporting, it is recommended that ground rotor blade strikes be reported as "incidents" under 830.5(a) by adding a new incident paragraph (11) as is done with NPRM adding paragraphs (8), (9), and (10). Such a paragraph could read: "(11) a main or tail rotor blade ground strike."

Regard

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